### SIMMONS HANLY CONROY, LLP

Jason 'Jay' Barnes (admitted *pro hac vice*) An Truong (admitted *pro hac vice*) Eric Johnson (admitted *pro hac vice*) 112 Madison Avenue, 7th Floor

New York, NY 10016 Telephone: (212) 784-6400 Facsimile: (212) 213-5949 jaybarnes@simmonsfirm.com atruong@simmonsfirm.com ejohnson@simmonsfirm.com

#### KIESEL LAW LLP

Jeffrey A. Koncius, State Bar No. 189803 Nicole Ramirez, State Bar No. 279017

8648 Wilshire Boulevard Beverly Hills, CA 90211-2910 Telephone: (310) 854-4444 Facsimile: (310) 854-0812 koncius@kiesel.law

## SCOTT+SCOTT ATTORNEYS AT LAW LLP

Hal D. Cunningham (Bar No. 243048) 600 W. Broadway, Suite 3300

San Diego, CA 92101 Telephone: (619) 233-4565 Facsimile: (619) 233-0508 hcunningham@scott-scott.com

### LOWEY DANNENBERG, P.C.

Christian Levis (admitted *pro hac vice*)
Amanda Fiorilla (admitted *pro hac vice*)
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 997-0500
Facsimile: (914) 997-0035
clevis@lowey.com
afiorilla@lowey.com

## LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Michael W. Sobol, State Bar. No. 194857 Melissa Gardner, State Bar No. 289096 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 Telephone: (415) 956-1000 Facsimile: (415) 956-1008 msobol@lchb.com mgardner@lchb.com

## LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Douglas Cuthbertson (admitted *pro hac vice*) 250 Hudson Street, 8th Floor New York, NY 10013 Telephone: 212 355-9500 Facsimile: 212-355-9592 dcuthbertson@lchb.com

Attorneys for Plaintiffs and the Proposed Class \*Additional counsel listed on signature page

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

JOHN DOE I, et al. on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

This document applies to: All Actions

Case No. 3:23-cv-02431-VC

Consolidated with: 3:23-cv-02343-VC

#### **CLASS ACTION**

## JOINT CASE MANAGEMENT STATEMENT

Judge: Hon. Vince Chhabria

Date: October 25, 2024, 10:00 a.m. Location: Courtroom 4, 17th Floor

Plaintiffs and Defendant Google LLC (collectively, "the Parties") in the above-captioned action, by and through their respective counsel of record, hereby submit the following Joint Case Management Statement pursuant to the Court's Notice Continuing Further Case Management Conference. ECF No. 156.

## I. STATUS OF PROCEEDINGS

On July 15, 2024, the Court continued the Case Management Conference scheduled for July 19, 2024 to October 25, 2024, after the Court's ruling on Google's first Motion to Dismiss. ECF No. 156. On July 22, 2024, the Court granted Google's first Motion to Dismiss and granted Plaintiffs leave to amend their complaint. *See* ECF No. 157. Plaintiffs filed their Second Amended Consolidated Class Action Complaint ("Second Amended Complaint") on August 12, 2024. ECF No. 158. Google filed a Motion to Dismiss the Second Amended Complaint (the "Motion") on September 3, 2024. ECF No. 164. Plaintiffs oppose Google's Motion. ECF No. 168. The Motion is fully briefed and scheduled to be heard by the Court on November 7, 2024.

## II. <u>DISCOVERY</u>

Discovery was stayed pending an order on Google's first Motion to Dismiss. ECF No. 119. Judge van Keulen entered a Stipulated Protective Order on May 7, 2024. ECF No. 142. Judge van Keulen entered a Stipulated Order re: Discovery of Electronically Stored Information and Hard Copy Documents on June 12, 2024. ECF No. 148.

### III. <u>FURTHER PROCEEDINGS</u>

Given that the Court has not yet heard argument on Google's Motion and it remains pending, the Parties jointly request that the Further Case Management Conference currently scheduled for October 25, 2024 be continued to a date convenient to the Court following the Court's ruling on Google's Motion.

Dated: October 18, 2024 LOWEY DANNENBERG, P.C.

/s/ Christian Levis

Christian Levis (admitted pro hac vice) clevis@lowey.com

Amanda Fiorilla (admitted pro hac vice)

afiorilla@lowey.com 44 South Broadway, Suite 1100 White Plains, NY 10601 Tel.: (914) 997-0500

Fax: (914) 997-0035

#### SIMMONS HANLY CONROY LLP

Jason 'Jay' Barnes (admitted pro hac vice) jaybarnes@simmonsfirm.com
An Truong (admitted pro hac vice) atruong@simmonsfirm.com
112 Madison Avenue, 7th Floor
New York, NY 10016

Tel.: 212-784-6400 Fax: 212-213-5949

#### KIESEL LAW LLP

Jeffrey A. Koncius, State Bar No. 189803 koncius@kiesel.law
Nicole Ramirez, State Bar No. 279017 ramirez@kiesel.law
Mahnam Ghorbani, State Bar No. 345360 ghorbani@kiesel.law
8648 Wilshire Boulevard
Beverly Hills, CA 90211-2910

Tel.: 310-854-4444 Fax: 310-854-0812

# LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Michael W. Sobol, State Bar No. 194857

msobol@lchb.com

Melissa Gardner, State Bar No. 289096

mgardner@lchb.com

Jallé H. Dafa, State Bar No. 290637

jdafa@lchb.com

275 Battery Street, 29th Floor
San Francisco, CA 94111-3339

Tel.: 415 956-1000 Fax: 415-956-1008

Douglas Cuthbertson (admitted *pro hac vice*) dcuthbertson@lchb.com
250 Hudson Street, 8th Floor
New York, NY 10013

Tel.: 212 355-9500 Fax: 212-355-9592

### SCOTT+SCOTT ATTORNEYS AT LAW LLP

Hal D. Cunningham, State Bar No. 243048 hcunningham@scott-scott.com
Sean Russell, State Bar No. 308962 srussell@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101

Tel.: (619) 233-4565 Fax: (619) 233-0508

Joseph P. Guglielmo (admitted pro hac vice) jguglielmo@scott-scott.com
Ethan Binder (admitted pro hac vice) ebinder@scott-scott.com
230 Park Ave., 17th Floor
New York, NY 10169

Tel.: (212) 223-6444 Fax: (212) 223-6334

Attorneys for Plaintiffs and the Proposed Class

Dated: October 18, 2024 WILLKIE FARR & GALLAGHER LLP

## /s/ Benedict Hur

Benedict Hur, State Bar No. 224018 bhur@willkie.com Simona Agnolucci, State Bar No. 246943 sagnolucci@willkie.com Eduardo Santacana, State Bar No. 281668 esantacana@willkie.com Joshua D. Anderson, State Bar No. 312836 jdanderson@willkie.com David D. Doak, State Bar No. 301319 ddoak@willkie.com Tiffany Lin, State Bar No. 321472 tlin@willkie.com Nadim Houssain, State Bar No. 335556 nhoussain@willkie.com Harris Mateen, State Bar No. 335593 hmateen@willkie.com Naiara Toker, State Bar No. 346145 ntoker@willkie.com

#### WILLKIE FARR & GALLAGHER LLP

333 Bush Street, 34th Floor San Francisco, California 94104 Telephone: (415) 858-7400 Facsimile: (415) 858-7599

Attorneys for Defendant Google LLC

## **ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 18, 2024 /s/ Christian Levis